

Message

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**From:** Ho, Yenhung [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0373CF6F13A849F1BB61BB1D1B64F981-YHO]  
**Sent:** 12/1/2020 4:25:31 PM  
**To:** Shari Ring [Shari.Ring@cadmusgroup.com]  
**CC:** Rao, Kate [Rao.kate@epa.gov]  
**Subject:** RE: [EXT] FW: Technical Response #2 - Inquiry

Hi Shari,

I will reach out to Rebecca and find out.

Thanks,  
Calvin

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**From:** Shari Ring <Shari.Ring@cadmusgroup.com>  
**Sent:** Tuesday, December 1, 2020 8:20 AM  
**To:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Cc:** Rao, Kate <Rao.kate@epa.gov>  
**Subject:** RE: [EXT] FW: Technical Response #2 - Inquiry

Hi Calvin

I am reviewing CES's response to our questions about the emergency and remedial response plan. The PDF of the plan they submitted includes the risk register that they shared with us before the October call (attached to Rebecca's 10/27 email below). As you may recall, it was a very complicated spreadsheet, that I spent some time reviewing in advance of that call. Given the difference in formats, it's a little tricky to figure out whether the contents of the PDF are identical to the spreadsheet.

Would it be appropriate to ask Rebecca to either confirm that the PDF contains the same spreadsheet CES shared in October or to provide a copy of an updated spreadsheet?

That would facilitate our review of the E&RR Plan.

Thanks.

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**From:** Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Sent:** Tuesday, October 27, 2020 4:37 PM  
**To:** Shari Ring <Shari.Ring@cadmusgroup.com>  
**Cc:** Rao, Kate <Rao.kate@epa.gov>  
**Subject:** [EXT] FW: Technical Response #2 - Inquiry

Hi Shari,

CES has requested another Q&A call regarding Class VI matter. Will Cadmus be available either on 11/4, from 10am to 11am, or on 11/6, from 1pm to 2pm PST?

Please be prepared to respond to CES's questions below during the call.

Thanks,  
Calvin

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**From:** Natalie Nowiski <NNowiski@slb.com>  
**Sent:** Tuesday, October 27, 2020 11:35 AM  
**To:** Albright, David <Albright.David@epa.gov>; Ho, Yenhung <Ho.Yenhung@epa.gov>  
**Cc:** 'Rebecca Hollis' <rhollis@cleanenergysystems.com>  
**Subject:** Technical Response #2 - Inquiry

Dear Calvin and David,

Hope you are both doing well. CES is in the process of finalizing the response to the Technical Evaluation Comments and Information Request #2, which will be submitted by October 31, 2020.

In Enclosure #1, EPA recommended that, *“for each scenario, the following be identified: severity of the impact, likelihood of the event; timing of the event; avoidance measures in place to reduce the likelihood of the event; detection methods that reflect planned testing and monitoring; response personnel; and equipment.”* As part of the response, the attached draft of the Project Risk Registrar was prepared to address these issues.

Can you please review and confirm whether the values of the “likelihood” and “severity” are acceptable at this time, or whether EPA would prefer that the values be separated into different categories (ie. Injury/Fatality; amount of damage; impact on project, etc.) for the scenarios that are identified. Please note that the analysis is preliminary given the stage of the project, and will be need to be updated, expanded upon and re-performed as more data becomes available.

Finally, would it be possible to arrange a telephone call next week to discuss questions regarding the risk assessment scenario process in general for Class VI Permitting Applications? We note that there are many different tools that can be utilized to perform these risk assessments, some which utilize a qualitative approach, and others which are quantitative or semi quantitative in nature. We were hoping to obtain further information and guidance as to which methodologies are best suited / preferred by the EPA for Class VI Permitting.

Please let me know if you have any questions or require further clarification.

Best regards,  
Natalie

**Natalie Nowiski**  
CCS Business Developer and Legal Counsel

**Schlumberger New Energy**

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